



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

**D.H., a minor, by her next friends A.H.,
mother, and E.H., father,
Plaintiff,**

v.

**WILLIAMSON COUNTY BOARD OF
EDUCATION, et al.,
Defendants.**

**Civil Action No. 3:22-cv-00570
Judge Campbell/Frensley**

JOINT MOTION TO AMEND INITIAL CASE MANAGEMENT ORDER

Come the parties pursuant to Fed. R. Civ. Pr. 16(b)(4), and jointly move the court to make the following adjustments to certain deadlines outlined in the Initial Case Management Order (Doc. 104) entered on November 8, 2023. The parties would show that written discovery commenced later than anticipated due to the great care taken by the parties in negotiating a mutually agreeable Protective Order. This level of care was required to ensure adequate protection of the many forms of sensitive personal information at issue in this case, which includes information about minors. Since the Protective Order was filed, the parties have exchanged their initial disclosures and delivered their respective discovery requests, while working together in good faith to coordinate on dates for depositions. At this juncture, the parties agree that additional time to complete fact discovery would aid in the orderly resolution of this case. The proposals for modification of deadlines will not unduly delay the progress of this case nor adversely impact the current trial date of August 26, 2025, set by Order of Judge Campbell on November 9, 2023 (Doc. 105). The scheduling extensions outlined herein will still conform to the requirements of Local Rule 16.01(h)(1) that no dispositive motion deadline, including response and reply briefs, shall be

later than 90 days in advance of the trial date. All deadlines set in the Initial Case Management Order, including those unaffected by this Joint Motion, are included below for the Court's reference.

DISCOVERY: The parties request that the deadline for completion of written discovery and depositions of fact witnesses be moved from June 18, 2024, to **September 13, 2024**.

The parties request that the deadline for filing of all discovery-related motions be postponed from July 18, 2024, to **October 11, 2024**, unless otherwise ordered by the Court.

MOTIONS TO AMEND OR TO ADD PARTIES: The parties note that the deadline for amending or adding parties was January 18, 2024, and has already passed. The parties do not seek to extend this deadline.

DISCLOSURE AND DEPOSITIONS OF EXPERTS: The parties request that the deadlines related to disclosure and depositions of experts be revised as follows:

Plaintiff shall identify and disclose all expert witnesses and expert reports on or before **August 16, 2024**, rather than July 24, 2024.

Defendants must identify and disclose all expert witnesses and reports on or before **October 18, 2024**, rather than September 23, 2024.

Expert depositions must be completed by the original deadline of **November 29, 2024**.

TELEPHONE STATUS CONFERENCE: The parties note that the May 1, 2024, status conference occurred as scheduled. An additional status conference has not been scheduled, and the parties do not seek one at this time.

DISPOSITIVE MOTIONS: The parties do not request any adjustment to the dispositive motion deadline of **February 28, 2025**, the responses to be filed within 28 days after the filing of the motion, or the optional replies to be filed within 14 days after the filing of the response.

Accordingly, the parties respectfully jointly request that the Court grant their motion as outlined herein.

APPROVED FOR ENTRY:

/s/ Tricia Herzfeld

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served via the Court's CM/ECF system which electronically served a copy on this 10th day of June, 2024, to all counsel of record:

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/s/ Tricia R. Herzfeld

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